

FILED

APR 18 2018

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

VS.

MARK D. VAN RONZELLEN,

Defendant.

NO. S1 4:18 CR 295 AGF JMB

SUPERSEDING INDICTMENT

COUNT ONE

On or about March 5, 2018, in St. Charles County, which is located within the Eastern District of Missouri,

MARK D. VAN RONZELEN,

the defendant herein, did falsely assume or pretend to be an officer or employee acting under the authority of the United States or any department, agency or office thereof and acted as such to wit: the defendant followed J.W.'s vehicle to J.W.'s residence and displayed to J.W. a fraudulent identification card of the Federal Bureau of Investigation and a law enforcement badge and further advised J.W. that he was employed by the Federal Bureau of Investigation.

In violation of Title 18, United States Code, Section 912.

COUNT TWO

On or about March 5, 2018, in St. Charles County, which is located within the Eastern District of Missouri,

MARK D. VAN RONZELEN,

the defendant herein, did possess a colorable imitation of an identification card and insignia, of the design prescribed by the head of any department or agency of the United States for use by any

officer or employee thereof, to wit: a fraudulent Federal Bureau of Investigation identification card bearing the photograph of the defendant and reflecting that the defendant is a "Special Agent".

In violation of Title 18, United States Code, Section 701.

COUNT THREE

Between on or about November 1, 2017 and November 29, 2017, in the Eastern District of Missouri,

MARK D. VAN RONZELEN,

the defendant herein, did knowingly and without lawful authority produce a false identification document to wit counterfeit United States White House Press Pool credentials, bearing the defendant's name and purporting to be affiliated with "Fox News", that appeared to have been issued by or under the authority of the United States but was never so issued.

In violation of Title 18, U.S.C. Sections 1028(a)(1).

COUNT FOUR

On or about April 5, 2018, in St. Charles County, which is located within the Eastern District of Missouri,

MARK D. VAN RONZELEN,

the defendant herein, in or affecting interstate commerce, did knowingly possess a document-making implement, to wit a computer and printer, with the intent that such implement would be used in the production of a false identification document, such document-making implement being designed or suited for making a false identification document that is or appears to be issued by or under the authority of the United States.

In violation of Title 18, U.S.C., Section 1028(a)(5).

COUNT FIVE

On or about March 30, 2018, in St. Charles County, which is located within the Eastern District of Missouri,

MARK D. VAN RONZELEN,

the defendant herein, did knowingly possess, transfer, and use in or affecting interstate commerce, without lawful authority, a means of identification of another person to wit, the name of "B.A." knowing that the means of identification belonged to another actual person, with the intent to commit, or in connection with, any unlawful activity that constitutes a felony under any applicable State law, to wit, Forgery, Section 570.090 (1), (3), and (4) of the Revised Statutes of Missouri.

In violation of Title 18, U.S.C. Section 1028(a)(7).

A TRUE BILL.

FOREPERSON

JEFFREY B. JENSEN
United States Attorney

JENNIFER J. ROY, #47203MO
Assistant United States Attorney